

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

City of Chicago,

*Plaintiff,*

v.

DoorDash, Inc. and Caviar, LLC,

*Defendants.*

Civil Action No. 1:21-cv-05162

Honorable Jeremy C. Daniel  
Magistrate Judge Jeffrey T. Gilbert

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**DEFENDANTS DOORDASH, INC. AND CAVIAR, LLC’S  
MOTION TO FILE CERTAIN DOCUMENTS UNDER SEAL**

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Defendants DoorDash, Inc. and Caviar, LLC (collectively “DoorDash”) respectfully request leave to file under seal Exhibit F to Elizabeth McCloskey’s Declaration in Support of DoorDash’s Motion to Compel. Exhibit F includes the City’s supplemental responses to DoorDash’s First Set of Interrogatories. Plaintiff the City of Chicago (“City”) has designated that document as Confidential under the Court’s Confidentiality Order. Dkt. 79.

In support thereof, DoorDash states as follows:

1. On November 4, 2022, the Court entered a Confidentiality Order in this case protecting from disclosure certain documents containing confidential or highly confidential information regarding, *inter alia*, certain non-public communications. See Dkt. 79.
2. A moving party may seek to file under seal “information that meets the definition of trade secret or other confidential information.” *Williamson v. S.A. Gear Co., Inc.*, 2017 WL 3971043, at \*1 (S.D. Ill. Sept. 8, 2017); accord Dkt. 79 ¶ 2.

3. The designating party bears the burden of demonstrating the propriety of filing under seal. Dkt. 79 ¶ 9.

4. Here, DoorDash has filed Exhibit F under seal. This document includes the City's supplemental responses to DoorDash's First Set of Interrogatories. The City has designated this document as Confidential, and DoorDash accordingly has provisionally filed it under seal pursuant to the Confidentiality Order. DoorDash has not independently verified Plaintiff's designations and relies on its designations in requesting leave to file under seal.

5. Plaintiff does not oppose this Motion for Leave to File Under Seal.

WHEREFORE, DoorDash respectfully requests that the Court enter an Order granting DoorDash leave to file an unredacted version of its Exhibit F (City's Supplemental Responses to DoorDash's First Set of Interrogatories), under seal.

Dated: May 15, 2024

Respectfully submitted,

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